

1 PHILLIP A. TALBERT
Acting United States Attorney
2 DEBORAH L. STACHEL
Regional Chief Counsel
3 GERALYN A. GULSETH
Special Assistant United States Attorney
4 Social Security Administration
160 Spear Street, Suite 800
5 San Francisco, CA 94105
Telephone: (510) 970-4819
6 Facsimile: (415) 744-0134

7 Attorneys for Defendant

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10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12 SACRAMENTO DIVISION
13

14 ASHLEY RUDOLPH,

15
16 Plaintiff,

17 v.

18 KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

19 Defendant.
20

No. 2:20-cv-00922-DMC

STIPULATION AND ORDER FOR EXTENSION
TO FILE DEFENDANT'S OPPOSITION TO
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT AND/OR REMAND

21 The parties stipulate through counsel that Defendant, the Commissioner of Social Security
22 (the "Commissioner"), shall have a 60-day extension of time to file her opposition to Plaintiff's
23 motion for summary judgment. Defendant's response is currently due November 23, 2021.

24 The Special Assistant United States Attorney assigned to this case is currently on
25 extended leave. He is expected to return in early January. At this point, a more immediate re-
26 assignment to another staff attorney is not tenable given the high volume of cases and limited
27 staff due to leave and resignations.

28 This request is made in good faith and is not intended to delay the proceedings in this

1 matter.

2 WHEREFORE, Defendant requests until January 24, 2022¹, to file her response to
3 Plaintiff's motion for summary judgment.

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5 Respectfully submitted,

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7 DATE: November 18, 2021

/s/ Josephine Gerrard
JOSEPHINE GERRARD
Attorney for Plaintiff
(as approved via email on November 18, 2021)

10 PHILLIP A. TALBERT
Acting United States Attorney

11 DATE: November 18, 2021

12 By s/ GERALYN GULSETH
GERALYN GULSETH
Special Assistant United States Attorney

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14 Attorneys for Defendant

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16 ORDER

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18 Pursuant to stipulation, it is so ordered.

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20 Dated: November 29, 2021


DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE

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28 ¹ The 60th day - January 22, 2022 - falls on a Saturday.